INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

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Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

March 2, 2004

TO: Interested Parties / Applicant

RE: Multi-Color Corporation / SPM 143-18221-00007

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTV-PMOD.doc 9/16/03

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March 2, 2004

Mr. John P. McKeough
Multi-Color Corporation
2281 South U.S. 31
Scottsburg, IN 47170

Re: 143-18221
Significant Permit Modification to
Part 70 Permit No.: 143-9310-00007

Dear Mr. McKeough:

Multi-Color Corporation was issued a Part 70 permit on April 16, 2001, for the operation of a stationary packaging rotogravure printing source. An application to modify the source was received by the Office of Air Quality (OAQ) on September 18, 2003. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification is as follows:

(a) replace the previously permitted (not yet constructed) nine (9) station packaging rotogravure printing press identified as Press # 4, with a ten (10) station packaging rotogravure printing press. Both the previously permitted and proposed printing presses have a maximum design line speed of 800 feet per minute;

(b) replace the control devices of Press # 4 (OXD # 3 and OXD # 4, with a maximum combined design capacity of 9.0 MMBtu/ hr), with a single natural gas fired regenerative thermal oxidizer (OXD # 6 with a maximum design capacity of 204.0 MMBtu/ hr). OXD # 6 will also replace the existing control device of press # 1 (OXD # 1, with a maximum design capacity of 11.0 MMBtu/ hr). The emissions from the thermal oxidizer will be exhausted through stack S-OXD6 instead of existing S-OXD3 and S-OXD4, along with S-OXD1; and

(c) remove solvent cold cleaner degreaser SD1.

The changes made in the Part 70 Operating Permit are presented in the attached Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. A complete copy of the modified permit is attached.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Rajesh Thotakura, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3216, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
RT / EVP

c: File - Scott County
U.S. EPA, Region V
Scott County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Ambil
Administrative and Development
Technical Support and Modeling - Michele Boner

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Multi-Color Corporation
2281 South U.S. 31
Scottsburg, Indiana 47170

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T143-9310-00007	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 16, 2001 Expiration Date: April 16, 2006

First Administrative Amendment No.: 143-15020-00007 First Significant Permit Modification No.: 143-16498-00007	Date Issued: December 5, 2001 Date Issued: March 25, 2003

Second Significant Permit Modification No.: 143-18221-00007	Pages Modified: 3, 4, 7, 31 through 163

Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 2, 2004

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary packaging rotogravure printing source.

Responsible Official:	John P. McKeough, Vice President of Operations
Source Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
Mailing Address:	2281 South U.S. 31, Scottsburg, Indiana 47170
SIC Code:	2754
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or

(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or

(3) wo (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine

stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or

(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or

(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-10 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6; and

(e) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) one (1) natural gas fired hot oil boiler identified as TH1 used to heat Press #3, rated at 6 MMBtu per hour and exhausting through one (1) stack identified as S004.

(b) VOC and/or HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000.

(c) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.

(d) Other categories with emissions below insignificant thresholds:

(1) one (1) corona treater unit which generates ozone at a rate of 0.074 pounds ozone/kilowatt/hour (supplier factor). Ozone generation rates for Press #2 treater: 16 kW = 5.18 tons per year ozone maximum.

(2) one (1) 10,000 gallon, three-compartment horizontal solvent storage tank, storing isopropyl acetate or lower vapor pressure products, with VOC emissions below 15 pounds per day;

(3) one (1) 8,000 gallon vertical solvent storage tank, storing isopropyl acetate or lower vapor pressure products, with VOC emissions below 15 pounds per day;

(4) Ink mixing activities including an automated ink dispensing system with VOC emissions below 15 pounds per day;

(5) One (1) Offset Gravure Coater station with an Electron Beam Curing Unit, with a maximum line speed of 1000 feet per minute and a printing width of 42 inches with maximum coverage of 4.74 pounds per million square inches;

(6) two (2) cyclone separators for collecting paper and plastic trim generated from label trimming operations, which is then fed to a bailer which bales the material in preparation for off-site recycling or disposal. Potential PM-10 emissions from this operation are less than 25 pounds per day; and

(7) Two (2) seaming machines, each has a maximum application rate of 31.84 pounds of solvent per 1,000,000 meters of substrate; and a run speed of 140 meters per minute (mpm).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:.

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 1 for Printing Stations Using Compliant (i.e., Water-based) Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-10 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6; and-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

(a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or

(b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or

(c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.1.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(1), to demonstrate compliance with this standard, the Permittee shall demonstrate that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on an as-purchased basis, as determined in accordance with Condition D.1.7(a).

(c) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.1.7(b). The source is in compliance for the month if the total mass of organic HAP emitted by the source was not more than five percent of the total mass of organic HAP applied by the source. The total mass of organic HAP applied by the affected source in the month shall be determined by the Permittee using the following equation:

$$H = \sum_{i=1}^{p} M_i C_{hi} + \sum_{j=1}^{q} M_j C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.1.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.1.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.1.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1] [326 IAC 20-18-1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the

following requirements:

(a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure below and shall use this value for the organic HAP content for all compliance purposes.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci}.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj}.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci} C_{hi} + \sum_{j=1}^{q} M_{Cj} C_{hj}\right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100}\right)\right] + \left[\sum_{i=1}^{p} M_{Bi} C_{hi} + \sum_{j=1}^{q} M_{Bj} C_{hj}\right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.1.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.1.9 VOC Emissions

Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.1.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.1.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.1.4.

(d) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.1.4.

(e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.1.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one (1) alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.1.13 Record keeping Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:

(1) The name and identification number of each coating, as applied;

(2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;

(3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and

(4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.1.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 2-4.1] [326 IAC 20-18-1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.1.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(1) All required measurements needed to demonstrate compliance with Condition D.1.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture

system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and

(2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.1.15 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:

(1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(A) Name and location of the coating facility;

(B) Time, date, and duration of the noncompliance; and

(C) Corrective action taken.

(2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.

(b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:

(1) The name and location of the source;

(2) The name, address, and telephone number of the person responsible for the source;

(3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;

(4) The name and identification number of each coating, as applied, used at each coating facility; and

(5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.1.17 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 2 through 10 in Conditions D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.1.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.1.18 Reporting Requirements [40CFR 63.830] [326 IAC 2-4.1] [326 IAC 20-18-1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 2 through 10 in Conditions D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).

(b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.1.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 2 through 10 in Conditions D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.2 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 2 for Printing Stations Using Compliant (i.e., Water-based) Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-10 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6; and-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

(a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or

(e) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or

(c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.2.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.2.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(2), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with 40 CFR 63.825(b)(2)(i)-(ii). The Permittee shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application as follows:

(1) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR 63.827(b)(2) and condition D.2.7(a).

(2) Calculate the monthly average as-applied organic HAP content, C_{ahi} of each ink, coating, varnish, adhesive, primer, and other solids-containing material using the following equation:

$$C_{ahi} = \frac{\left[C_{hi} M_i - \sum_{j=1}^{q} C_{hij} M_{ij} \right]}{M_i - \sum_{j=1}^{q} M_{ij}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.2.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.2.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.2.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an

alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci}.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj}.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci} C_{hi} + \sum_{j=1}^{q} M_{Cj} C_{hj} \right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100} \right) \right] + \left[\sum_{i=1}^{p} M_{Bi} C_{hi} + \sum_{j=1}^{q} M_{Bj} C_{hj} \right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.2.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.2.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.2.9 VOC Emissions

Compliance with Condition D.2.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.2.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.2.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.2.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.2.4.

(d) The thermal oxidizing incinerator identified as OXD#6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.2.4.

(e) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.2.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative

operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.2.13 Record keeping Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:

(1) The name and identification number of each coating, as applied;

(2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;

(3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and

(4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.2.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.2.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(1) All required measurements needed to demonstrate compliance with Condition D.2.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and

(2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.2.15 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.2.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press while operating the incinerators;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.16 Reporting Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:

(1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(A) Name and location of the coating facility;

(B) Time, date, and duration of the noncompliance; and

(C) Corrective action taken.

(2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.

(b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:

(1) The name and location of the source;

(2) The name, address, and telephone number of the person responsible for the source;

(3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;

(4) The name and identification number of each coating, as applied, used at each coating facility; and

(5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.2.17 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 and 3 through 10 in Conditions D.1.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.2.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.2.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 and 3 through 10 in Conditions D.1.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).

(b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.1.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 and 3 through 10 in Conditions D.1.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.3 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 3 for Printing Stations Using Compliant (i.e., Water-based) Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-9 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

(a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or

(b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or

(c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.3.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.3.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(3)(i), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material either:

(1) contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis; or

(2) contains no more than 0.20 kg of organic HAP per kg of solids applied, on a monthly average as-applied basis.

(c) Pursuant to 40 CFR 63.825(b)(3)(ii), the Permittee may demonstrate compliance in accordance

with 40 CFR 63.825(b)(3)(ii) (A)-(C) as follows:

(1) Use the following procedures in accordance with 40 CFR 63.825(b)(2) to determine which materials contain no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis:

(A) The Permittee shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application as follows:

(i) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR 63.827(b)(2) and condition D.1.9(a).

(ii) Calculate the monthly average as-applied organic HAP content, C_{ahi} of each ink, coating, varnish, adhesive, primer, and other solids-containing material using the following equation:

$$C_{ahi} = \frac{\left[C_{hi} M_i + \sum_{j=1}^{q} C_{hij} M_{ij} \right]}{M_i + \sum_{j=1}^{q} M_{ij}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

(2) Determine the as-applied solids content following the procedure in 40 CFR 63.827(c)(2) and condition D.3.7(a) of all materials which do not meet the requirements of paragraph (b)(1) of this condition. The Permittee may calculate the monthly average as-applied solids content of materials which are reduced, thinned, or diluted prior to application, using the following equation:

$$C_{asi} = \frac{C_{si} M_i}{M_i + \sum_{j=1}^{q} M_{ij}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

(3) Calculate the as-applied organic HAP to solids ratio, H_{si}, for all materials which do not meet the requirements of paragraph (b)(1) of this condition, using the following equation:

$$H_{si} = \frac{C_{ahi}}{C_{asi}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.3.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.3.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.3.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci}.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj}.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci} C_{hi} + \sum_{j=1}^{q} M_{Cj} C_{hj}\right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100}\right)\right] + \sum_{i=1}^{p} M_{Bi} C_{hi} + \sum_{j=1}^{q} M_{Bj} C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.3.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.3.9 VOC Emissions

Compliance with Condition D.3.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.3.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.3.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.3.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.3.4.

(d) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.3.4.

(e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.3.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.3.13 Record keeping Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall

for each coating facility and for each coating used collect and record each day and maintain all of the following information:

(1) The name and identification number of each coating, as applied;

(2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;

(3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and

(4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.3.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.3.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(1) All required measurements needed to demonstrate compliance with Condition D.3.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and

(2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.3.15 Record Keeping Requirements

(a) To document compliance with Condition D.3.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.3.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press while operating the incinerators;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.16 Reporting Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:

(1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(A) Name and location of the coating facility;

(B) Time, date, and duration of the noncompliance; and

(C) Corrective action taken.

(2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.

(b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:

(1) The name and location of the source;

(2) The name, address, and telephone number of the person responsible for the source;

(3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;

(4) The name and identification number of each coating, as applied, used at each coating

facility; and

(5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.3.17 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1, 2 and 4 through 10 in Conditions D.1.17(a), D.2.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.3.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.3.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios1, 2, and 4 through 10 in Conditions D.1.18(a), D.2.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).

(b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.3.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1, 2, and 4 through 10 in Conditions D.1.18(b), D.2.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.4 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 4 for Printing Stations Using Compliant (i.e., Water-based) Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-9 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

(a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or

(b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or

(c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.4.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.4.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(4), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that the monthly average as-applied organic HAP content, H_L, of all materials applied is less than 0.04 kg HAP per kg of material applied, as determined by the following equation:

$$H_L = \frac{\sum_{i=1}^{p} M_i C_{hi} + \sum_{j=1}^{q} M_j C_{hj}}{\sum_{i=1}^{p} M_i + \sum_{j=1}^{q} M_j}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.4.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.4.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.4.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci}.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj}.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci} C_{hi} + \sum_{j=1}^{q} M_{Cj} C_{hj}\right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100}\right)\right] + \sum_{i=1}^{p} M_{Bi} C_{hi} + \sum_{j=1}^{q} M_{Bj} C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.4.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.4.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.4.9 VOC Emissions

Compliance with Condition D.4.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.4.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1

through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.4.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.4.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.4.4.

(d) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.4.4.

(e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.4.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.4.13 Record keeping Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:

(1) The name and identification number of each coating, as applied;

(2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;

(3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and

(4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.4.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.4.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(1) All required measurements needed to demonstrate compliance with Condition D.4.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and

(2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.4.15 Record Keeping Requirements

(a) To document compliance with Condition D.4.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.4.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to

verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press while operating the incinerators;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.16 Reporting Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:

(1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(A) Name and location of the coating facility;

(B) Time, date, and duration of the noncompliance; and

(C) Corrective action taken.

(2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.

(b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:

(1) The name and location of the source;

(2) The name, address, and telephone number of the person responsible for the source;

(3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;

(4) The name and identification number of each coating, as applied, used at each coating facility; and

(5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.4.17 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.4.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1, 2, 3, and 5 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.4.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.4.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios1, 2, 3, and 5 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).

(b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.4.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1, 2, 3, and 5 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.5 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 5 for Printing Stations Using Compliant (i.e., Water-based) Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 and P4U-9 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-8 and S-P4-9, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-9 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

(a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or

(b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or

(c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.5.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.5.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to no more than twenty (20) percent of the mass of solids applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(5), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that the monthly average as-applied organic HAP content on the basis of solids applied, H_S, is less than 0.20 kg HAP per kg of solids applied, as

determined by the following equation:

$$H_S = \frac{\sum_{i=1}^{p} M_i C_{hi} + \sum_{j=1}^{q} M_j C_{hj}}{\sum_{i=1}^{p} M_i C_{si}}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.5.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.5.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.5.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci}.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj}.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci} C_{hi} + \sum_{j=1}^{q} M_{Cj} C_{hj}\right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100}\right)\right] + \left[\sum_{i=1}^{p} M_{Bi} C_{hi} + \sum_{j=1}^{q} M_{Bj} C_{hj}\right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.5.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.5.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.5.1 and D.5.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data

supplied by the coating manufacturer.

D.5.9 VOC Emissions

Compliance with Condition D.5.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.5.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.5.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.5.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.5.4.

(d) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.5.4.

(e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.5.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.5.13 Record keeping Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:

(1) The name and identification number of each coating, as applied;

(2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;

(3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and

(4) If use of a coating is discontinued, the records required by this section shall be maintained consistent with 326 IAC 8-1-9(c).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.5.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.5.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(1) All required measurements needed to demonstrate compliance with Condition D.5.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and

(2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most

recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.5.15 Record Keeping Requirements

(a) To document compliance with Condition D.5.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.5.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press while operating the incinerators;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.16 Reporting Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:

(1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(A) Name and location of the coating facility;

(B) Time, date, and duration of the noncompliance; and

(C) Corrective action taken.

(2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.

(b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC

8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:

(1) The name and location of the source;

(2) The name, address, and telephone number of the person responsible for the source;

(3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;

(4) The name and identification number of each coating, as applied, used at each coating facility; and

(5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.5.17 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.5.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 4 and 6 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.6.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.5.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.5.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios1 through 4 and 6 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.6.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).

(b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.5.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 4 and 6 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.6.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.6 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 6 for Printing Stations Using Compliant (i.e., Water-based) Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound

(VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-9 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Graphic Arts Operations [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee uses one of the following types of compliant coatings:

(a) The volatile fraction of the ink, as it is applied to the substrate, contains twenty-five percent (25%) by volume or less of VOC, and seventy-five percent (75%) by volume or more of water; or

(b) The ink as it is applied to the substrate, less water, contains sixty percent (60%) by volume or more nonvolatile material; or

(c) The ink, as applied to the substrate, meets an emission limit of five-tenths (0.5) pounds of VOC per pound of solids in the ink.

D.6.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.6.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions

of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(6), to demonstrate compliance with this standard, the Permittee shall, for each press, demonstrate that the total monthly organic HAP applied, H, as determined by the following equation, is less than the calculated equivalent allowable organic HAP, H_a, as determined by 40 CFR 63.825(e) and Condition D.6.7(b):

$$H = \sum_{i=1}^{p} M_i C_{hi} - \sum_{j=1}^{q} M_j C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.6.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.6.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.6.6 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.6.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(a) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination

may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) Pursuant to 40 CFR 63.825(e), the Permittee shall calculate the monthly allowable HAP emissions, H_a, as follows:

(1) Determine the as-purchased mass of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, M_i.

(2) Determine the as-purchased solids content of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, in accordance with 40 CFR 63.827(c)(2), C_{si}, and part (a) above.

(3) Determine the as-purchased mass fraction of each ink, coating, varnish, adhesive, primer, and other solids-containing material which was applied at 20 weight-percent or greater solids content, on an as-applied basis, G_i.

(4) Determine the total mass of each solvent, diluent, thinner, or reducer added to materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, each month, M_{Lj}.

(5) Calculate the monthly allowable HAP emissions, H_a, using the following equation:

$$H_a = 0.20\left[\sum_{i=1}^{p} M_i G_i C_{si}\right] + 0.04\left[\sum_{i=1}^{p} M_i (1 - G_i)\right] + \left[\sum_{j=1}^{q} M_{Lj}\right]$$

(c) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which

are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci}.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj}.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci} C_{hi} + \sum_{j=1}^{q} M_{Cj} C_{hj}\right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100}\right)\right] + \left[\sum_{i=1}^{p} M_{Bi} C_{hi} + \sum_{j=1}^{q} M_{Bj} C_{hj}\right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(d) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.6.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.6.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.6.1 and D.6.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.6.9 VOC Emissions

Compliance with Condition D.6.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.6.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.6.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.6.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.6.4.

(d) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.6.4.

(e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.6.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.11 Parametric Monitoring

A continuous monitoring system shall be calibrated, maintained, and operated on each of the oxidizers for measuring operating temperature. The output of these systems shall be recorded, and the temperature for each oxidizer shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.12 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.6.13 Record Keeping Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-1-10(c) (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall for each coating facility and for each coating used collect and record each day and maintain all of the following information:

(1) The name and identification number of each coating, as applied;

(2) The mass of VOC (excluding water and exempt compounds) per volume of coating for each coating, as applied, or the VOC content of each coating, as applied, expressed in units necessary to determine compliance;

(3) As new compliant coatings are added to a coating facility, the records required by this condition shall be updated to include the new coating; and

(4) If use of a coating is discontinued, the records required by this section shall be maintained

consistent with 326 IAC 8-1-9(c).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.6.14 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain records of all measurements needed to demonstrate compliance with Condition D.6.3 on a monthly basis. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(1) All required measurements needed to demonstrate compliance with Condition D.6.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report); and

(2) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.6.15 Record Keeping Requirements

(a) To document compliance with Condition D.6.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.6.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press while operating the incinerators;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.16 Reporting Requirements [326 IAC 8-1-10]

(a) Pursuant to 326 IAC 8-5-5(c)(1), (2), or (4) and 326 IAC 8-1-10(d), the Permittee shall notify IDEM, OAQ in either of the following instances:

(1) Any record showing use of any noncompliant coatings shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following use; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(A) Name and location of the coating facility;

(B) Time, date, and duration of the noncompliance; and

(C) Corrective action taken.

(2) At least thirty (30) calendar days before changing the method of compliance from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall comply with all requirements of 326 IAC 8-1-12(b) of this rule, respectively. Upon changing the method of compliance for a coating facility from the use of compliant coatings to control devices, the Permittee shall comply with all requirements of 326 IAC 8-1-12.

(b) Pursuant to 326 IAC 8-1-10(b), upon changing the method of compliance for an existing coating facility from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall certify to IDEM, OAQ that the coating facility is in compliance with the requirements of 326 IAC 8-1-10. The certification shall include the following:

(1) The name and location of the source;

(2) The name, address, and telephone number of the person responsible for the source;

(3) Identification of each VOC emitting coating facility and identification of the applicable emission limitation;

(4) The name and identification number of each coating, as applied, used at each coating facility; and

(5) The mass of VOC (excluding water and exempt compounds) per volume of coating and the volume of each coating, as applied.

D.6.17 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.6.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 5 and 7 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.7.21(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.6.12 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.6.18 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios1 through 5 and 7 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.7.22(b), D.8.22(b), D.9.22(b), and D.10.22(b).

(b) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.6.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 5 and 7 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.7.22(e), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.7 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 7 for Printing Stations Using Solvent-Based Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-9 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

(c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:

(1) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F or at least a temperature determined in the most recent compliance tests (described in Condition D.7.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(2) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.7.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(3) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F or at least a temperature determined in the most recent compliance tests (described in Condition D.7.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(4) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.7.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):

(1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAQ.
(2) A copy of the operating and maintenance procedures shall be maintained in a convenient

location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.7.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.7.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to no more than five (5) percent of the organic HAP applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(7), to demonstrate compliance with this standard, the Permittee shall, for each press, operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95 percent for each month. The Permittee shall demonstrate compliance in accordance with the following provisions of 40 CFR 63.825(d):

(1) The Permittee shall demonstrate compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.7.9(a); and

(2) The Permittee shall demonstrate continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.7.14.

(c) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.7.9(b) and (c). The source is in compliance for the month if:

(1) All operating parameters required to be monitored under Condition D.7.14 were maintained at the appropriate values; and

(2) The total mass of organic HAP emitted by the source was not more than five percent of the total mass of organic HAP applied by the source. The total mass of organic HAP applied by the affected source in the month shall be determined by the Permittee using the following equation:

$$H = \sum_{i=1}^{p} M_i C_{hi} - \sum_{j=1}^{q} M_j C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822(b).

D.7.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.7.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.7.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions][326 IAC 20-1-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall have been developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

(a) The purpose of the SSM plan is to –

(1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;

(2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and

(3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.

(c) Record keeping associated with the SSM plan is identified in Condition D.7.17. Reporting associated with the SSM plan is identified in Condition D.7.22.

(d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAQ, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.

(e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAQ.

(f) IDEM, OAQ shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAQ may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAQ may require reasonable revisions to a SSM plan, if IDEM, OAQ finds that the plan:

(1) Does not address a startup, shutdown, or malfunction event that has occurred;

(2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or

(3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.

(g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

D.7.7 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.7.8 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

(a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

(b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(c) A compliance test shall be performed within ninety (90) days of:

(1) Startup of a new coating facility;

(2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or

(3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.

(d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(1) Test procedures;

(2) Operating and control system parameters;

(3) Type of VOC containing process material being used; and

(4) The process and control system parameters that will be monitored during the test.

D.7.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(a) Pursuant to 40 CFR 63.825(d)(1), the Permittee shall demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures outlined below.

(1) Determine the oxidizer destruction efficiency (E) for each of the control devices using the following procedure:

(A) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.

(iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.

(iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.

(v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as

applicable, at least twice during each test period.

(vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (a) through (c) below. The Permittee shall submit notice of the intended test method to IDEM, OAQ for approval along with notice of performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:

(a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.3; or

(b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or

(c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \left[\sum_{i=1}^{n} C_i M W_i \right] [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(B) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(C) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For each thermal oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. For each catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed.

These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.7.3.

(2) Pursuant to 40 CFR 63.827(e)(1), determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.7.3 by conducting a performance test in accordance with Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B to confirm that an enclosure meets the requirements for permanent total enclosure. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.

(3) Calculate the overall organic HAP control efficiency, (R), achieved by each control device and capture system using the following equation:

R = EF / 100

where E and F are determined according to paragraphs (a)(1) and (2) of this condition.

(4) Based on stack tests conducted in November and December of 1999 and June of 2000, the Permittee shall operate the oxidizers at all times the presses are in operation, maintain the 100 percent capture efficiencies, and demonstrate continuous compliance in accordance with the following:

(A) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).

(B) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).

(C) The thermal oxidizing incinerator identified as OXD#6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.7.3, and D.7.9(c).

(b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci}.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj}.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci} C_{hi} + \sum_{j=1}^{q} M_{Cj} C_{hj}\right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100}\right)\right] \left[\sum_{i=1}^{p} M_{Bi} C_{hi} + \sum_{j=1}^{q} M_{Bj} C_{hj}\right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(c) Pursuant to 40 CFR 63.825(d)(1)(xi), the Permittee is in compliance if the oxidizers are operated such that the average combustion temperature or average temperature upstream of the catalyst bed is greater than the operating parameter established in accordance with 40 CFR 63.828(a)(4) and Condition D.7.3 for each three-hour period, and the overall organic HAP control efficiency, R, is 95 percent or greater.

(d) Pursuant to 40 CFR 63.827(c)(2), the Permittee shall determine the volatile matter and solids content of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials applied by following the procedure below.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(e) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the

Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.7.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.7.10 Testing Requirements [Agreed Order A-3820]

Pursuant to Agreed Order A-3820, effective November 30, 1998, the Permittee shall conduct annual VOC testing at Presses Nos. 1, 2, 3, and 4 to demonstrate compliance with 326 IAC 8-5-5 and applicable permit conditions. This testing shall be conducted in accordance with the requirements of 326 IAC 3-6, Source Sampling Procedures. The Permittee shall conduct the first of these tests within the fourth quarter of 1999. Subsequent tests shall be conducted during the fourth quarter of each consecutive year. This requirement shall cease after the tests conducted in the fourth quarter 2000 provided that the Permittee demonstrated complete compliance with 326 IAC 8-5-5 and applicable permit conditions during both the 1999 and 2000 tests. The performance of annual VOC testing under this Order shall otherwise satisfy any similar VOC testing requirements imposed on the Permittee under its air permits for the period of the Agreed Order.

D.7.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.7.1 and D.7.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.7.12 VOC Emissions

Compliance with Condition D.7.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.7.13 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.7.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.7.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.7.4.

(d) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.7.4.

(e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.7.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.14 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

(a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate; and

(b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate.

D.7.15 Monitoring Requirements [40 CFR 63.828] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.7.3 to ensure proper operation and maintenance by implementing the following requirements:

(a) The Permittee shall, for each dryer associated with an intermittently-controllable work station, secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line.

(b) For the thermal oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in °C or ±1°C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(c) For each catalytic oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in °C or ±1°C, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

(d) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or

temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

(e) Any excursion from the required operating parameters which are monitored in accordance with this condition and Condition D.7.9(a)(4) and (c), unless otherwise excused, shall be considered a violation of Condition D.7.3.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.16 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.7.17 Record Keeping Requirements [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:

(1) The name and identification of each coating used at each coating facility.

(2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

(3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.

(4) The required overall emission reduction efficiency for each day for each coating facility.

(5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.7.8 pursuant to 326 IAC 8-1-12(b)(1)(C).

(6) Control device monitoring data as follows:

(A) For the thermal incinerator, the following:

(i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and

(ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(B) For each catalytic incinerator, the following:

(i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;

(ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and

(iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.

(7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.

(8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.7.18 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:

(1) Records of all measurements needed to demonstrate compliance with Conditions D.7.3 and D.7.6. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(A) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

(B) The occurrence and duration of each malfunction of the air pollution control equipment;

(C) All maintenance performed on the air pollution control equipment;

(D) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.7.6;

(E) All information necessary to demonstrate conformance with the SSM plan required in Condition D.7.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan (The information needed to demonstrate

conformance with the SSM plan may be recorded using a “checklist”, or some other effective form or record keeping, in order to minimize the record keeping burden for conforming events);

(F) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);

(G) All required measurements needed to demonstrate compliance with Condition D.7.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);

(H) All results of performance tests and CMS performance evaluations;

(I) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;

(J) All CMS calibration checks;

(K) All adjustments and maintenance performed on CMS; and

(L) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(2) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.7.14. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:

(A) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

(B) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

(C) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);

(D) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;

(E) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;

(F) The nature and cause of any malfunction (if known);

(G) The corrective action taken or preventive measures adopted;

(H) The nature of the repairs or adjustments to the CMS that was inoperative or out of

control;

(I) The total process operating time during the reporting period; and

(J) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

In order to satisfy the requirements of paragraphs (F) through (H) of this condition and to avoid duplicative record keeping efforts, the Permittee may use the SSM plan or records kept to satisfy the record keeping requirements of the SSM plan specified in Condition D.7.6, provided that such plan and records adequately address the requirements of paragraphs (F) through (H) of this condition.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.7.19 Record Keeping Requirements

(a) To document compliance with Condition D.7.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.7.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press while operating the incinerators;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.20 Record Keeping Requirements [Agreed Order A-3820]

Pursuant to Agreed Order #A-3820, effective November 30, 1998, for a period of four (4) years, the Permittee shall maintain, and provide upon request, a record of all times that an incinerator is

overloaded or shuts down and results in the triggering of the automatic press shut-off. This record should include the dates, times, and the presses and incinerators involved in each of these incidents.

D.7.21 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

(a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(1) Name and location of the coating facility;

(2) Identification of the control system where the noncompliance occurred and the coating facility it served;

(3) Time, date and duration of the noncompliance; and

(4) Corrective action taken.

(b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.7.22 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.7.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 6 and 8 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.8.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.7.15 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.7.23 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAQ require monitoring of an alternate parameter.

(b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 6 and 8 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.8.22(b), D.9.22(b), and D.10.22(b).

(c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).

(d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).

(1) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.7.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAQ; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).

(2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.

(e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.7.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 6 and 8 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.8.22(e), D.9.22(e), and D.10.22(e).

SECTION D.8 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 8 for Printing Stations Using Solvent-Based Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-9 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

(c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:

(1) The catalytic oxidizing incinerator identified as OXD #1 shall maintain a minimum operating temperature of 650°F or a temperature determined in the most recent compliance tests (described in Condition D.8.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(2) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F or a temperature determined in the most recent compliance tests (described in Condition D.8.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(3) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F or a temperature determined in the most recent compliance tests (described in Condition D.8.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(4) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.8.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):

(1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAQ.

(2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.8.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.8.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to no more than twenty (20) percent of the mass of solids applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(8), to demonstrate compliance with this standard, the Permittee shall, for each press, operate a capture system and control device and limit the organic HAP emission rate to no more than 0.20 kg organic HAP emitted per kg solids applied as determined on a monthly average as-applied basis. The Permittee shall demonstrate compliance in accordance with the following provisions of 40 CFR 63.825(d):

(1) The Permittee shall demonstrate compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.8.9(a); and

(2) The Permittee shall demonstrate continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.8.14.

(c) The Permittee shall determine the solids content and organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(c)(2) and Condition D.8.9(c) and (d).

(d) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.8.9(b). The source is in compliance for the month if:

(1) All operating parameters required to be monitored under Condition D.8.14 were maintained at the appropriate values; and

(2) The total mass of organic HAP emitted by the source was not more than twenty percent of the total mass of solids applied by the source.

D.8.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage

limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.8.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.8.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions] [326 IAC 20-1-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall have been developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

(a) The purpose of the SSM plan is to –

(1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;

(2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and

(3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.

(c) Record keeping associated with the SSM plan is identified in Condition D.8.17. Reporting associated with the SSM plan is identified in Condition D.8.22.

(d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAQ, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.

(e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAQ.

(f) IDEM, OAQ shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAQ may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAQ may require reasonable revisions to a SSM plan, if IDEM, OAQ finds that the plan:

(1) Does not address a startup, shutdown, or malfunction event that has occurred;

(2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or

(3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.

(g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

D.8.7 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.8.8 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

(a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

(b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(c) A compliance test shall be performed within ninety (90) days of:

(1) Startup of a new coating facility;

(2) Changing the method of compliance for an existing coating facility from compliant coatings

or daily-weighted averaging to control devices; or

(3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.

(d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(1) Test procedures;

(2) Operating and control system parameters;

(3) Type of VOC containing process material being used; and

(4) The process and control system parameters that will be monitored during the test.

D.8.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(a) Pursuant to 40 CFR 63.825(d)(1), the Permittee shall demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures outlined below.

(1) Determine the oxidizer destruction efficiency (E) for each of the control devices using the following procedure pursuant to 40 CFR 63.827(d):

(A) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each thermal oxidizer and the associated catalyst bed inlet temperature for each catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.

(iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.

(iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.

(v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.

(vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (a) through (c) below. The Permittee shall submit notice of the intended test method to IDEM, OAQ for approval along with notice of the performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:

(a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.3; or

(b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or

(c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \left[\sum_{i=1}^{n} C_i \, M \, W_i \right] [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(B) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(C) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For each thermal oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. For each catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.8.3.

(2) Pursuant to 40 CFR 63.827(e)(1), determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.8.3 by conducting a performance test in accordance with Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B to confirm that an enclosure meets the requirements for permanent total enclosure. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.

(3) Calculate the overall organic HAP control efficiency, (R), achieved by each control device and capture system using the following equation:

R = EF / 100

where E and F are determined according to paragraphs (a)(1) and (2) of this condition.

(4) Based on stack tests conducted in November and December of 1999 and June of 2000, the Permittee shall operate the oxidizers at all times the presses are in operation, maintain the 100 percent capture efficiencies, and demonstrate continuous compliance in accordance with the following:

(A) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.8.3, and D.8.9(d).

(B) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.8.3, and D.8.9(d).

(C) The thermal oxidizing incinerator identified as OXD#6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.8.3, and D.8.9(d).

(D) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.8.3, and D.8.9(d).

(b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, $M_{C\,i}$.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, $M_{C\,j}$.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci}\, C_{hi} + \sum_{j=1}^{q} M_{Cj}\, C_{hj}\right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100}\right)\right] + \sum_{i=1}^{p} M_{Bi}\, C_{hi} + \sum_{j=1}^{q} M_{Bj}\, C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(c) Pursuant to 40 CFR 63.827(c)(2), the Permittee shall determine the volatile matter and solids content of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials applied by following the procedure below.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(d) Pursuant to 40 CFR 63.825(d)(1)(xi), the Permittee is in compliance if the oxidizers are operated such that the average combustion temperature or average temperature upstream of the catalyst bed is greater than the operating parameter established in accordance with 40 CFR 63.828(a)(4) and condition D.8.9 for each three-hour period, and the organic HAP emission rate based on solids applied, L, is 0.20 kg organic HAP per kg solids applied or less.

(e) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.8.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.8.10 Testing Requirements [Agreed Order A-3820]

Pursuant to Agreed Order A-3820, effective November 30, 1998, the Permittee shall conduct annual VOC testing at Presses Nos. 1, 2, 3, and 4 to demonstrate compliance with 326 IAC 8-5-5 and applicable permit conditions. This testing shall be conducted in accordance with the requirements of 326 IAC 3-6, Source Sampling Procedures. The Permittee shall conduct the first of these tests within the fourth quarter of 1999. Subsequent tests shall be conducted during the fourth quarter of each consecutive year. This requirement shall cease after the tests conducted in the fourth quarter 2000 provided that the Permittee demonstrated complete compliance with 326 IAC 8-5-5 and applicable permit conditions during both the 1999 and 2000 tests. The performance of annual VOC testing under this Order shall otherwise satisfy any similar VOC testing requirements imposed on the Permittee under its air permits for the period of the Agreed Order.

D.8.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.8.1 and D.8.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.8.12 VOC Emissions

Compliance with Condition D.8.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.8.13 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.8.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.8.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.8.4.

(d) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.8.4.

(e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.8.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.8.14 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

(a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate; and

(b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate.

D.8.15 Monitoring Requirements [40 CFR 63.828] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.8.3 to ensure proper operation and maintenance by implementing the following requirements:

(a) The Permittee shall, for each dryer associated with an intermittently-controllable work station, secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line.

(b) For the thermal oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in °C or ±1°C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(c) For each catalytic oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in °C or ±1°C, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

(d) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

(e) Any excursion from the required operating parameters which are monitored in accordance with this condition and Condition D.8.9(c)(4) and (d), unless otherwise excused, shall be considered a violation of Condition D.8.3.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.8.16 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.8.17 Record Keeping Requirements [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:

(1) The name and identification of each coating used at each coating facility.

(2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

(3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.

(4) The required overall emission reduction efficiency for each day for each coating facility.

(5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.8.8 pursuant to 326 IAC 8-1-12(b)(1)(C).

(6) Control device monitoring data as follows:

(A) For the thermal incinerator, the following:

(i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and

(ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(B) For each catalytic incinerator, the following:

(i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;

(ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and

(iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.

(7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.

(8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.8.18 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:

(1) Records of all measurements needed to demonstrate compliance with Conditions D.8.3 and D.8.6. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(A) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

(B) The occurrence and duration of each malfunction of the air pollution control equipment;

(C) All maintenance performed on the air pollution control equipment;

(D) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.8.6;

(E) All information necessary to demonstrate conformance with the SSM plan required in Condition D.8.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan (The information needed to demonstrate conformance with the SSM plan may be recorded using a “checklist”, or some other effective form or record keeping, in order to minimize the record keeping burden for conforming events);

(F) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);

(G) All required measurements needed to demonstrate compliance with Condition D.8.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);

(H) All results of performance tests and CMS performance evaluations;

(I) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;

(J) All CMS calibration checks;

(K) All adjustments and maintenance performed on CMS; and

(L) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(2) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.8.14. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:

(A) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

(B) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

(C) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);

(D) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;

(E) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;

(F) The nature and cause of any malfunction (if known);

(G) The corrective action taken or preventive measures adopted;

(H) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;

(I) The total process operating time during the reporting period; and

(J) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

In order to satisfy the requirements of paragraphs (F) through (H) of this condition and to avoid duplicative record keeping efforts, the Permittee may use the SSM plan or records kept to satisfy the record keeping requirements of the SSM plan specified in Condition D.8.6, provided that such plan and records adequately address the requirements of paragraphs (F) through (H) of this condition.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.8.19 Record Keeping Requirements

(a) To document compliance with Condition D.8.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.8.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press while operating the incinerators;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.8.20 Record Keeping Requirements [Agreed Order A-3820]

Pursuant to Agreed Order #A-3820, effective November 30, 1998, for a period of four (4) years, the Permittee shall maintain, and provide upon request, a record of all times that an incinerator is overloaded or shuts down and results in the triggering of the automatic press shut-off. This record should include the dates, times, and the presses and incinerators involved in each of these incidents.

D.8.21 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

(a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(1) Name and location of the coating facility;

(2) Identification of the control system where the noncompliance occurred and the coating facility it served;

(3) Time, date and duration of the noncompliance; and

(4) Corrective action taken.

(b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.8.22 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.8.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 7 and 9 through 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.9.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.8.15 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.8.23 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAQ require monitoring of an alternate parameter.

(b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 7 and 9 through 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.9.22(b), and D.10.22(b).

(c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).

(d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).

(1) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.8.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAQ; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).

(2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.

(e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating

parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.8.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 7 and 9 through 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.9.22(e), and D.10.22(e).

SECTION D.9 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 9 for Printing Stations Using Solvent-Based Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-9 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

(c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:

(1) The catalytic oxidizing incinerator identified as OXD #1 shall maintain a minimum operating temperature of 650°F or a temperature determined in the most recent compliance tests (described in Condition D.9.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(2) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F or a temperature determined in the most recent compliance tests (described in Condition D.9.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(3) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F or a temperature determined in the most recent compliance tests (described in Condition D.9.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(4) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.9.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):

(1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or

subsequent compliance test or upon the written request of IDEM, OAQ.

(2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.9.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.9.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(9), to demonstrate compliance with this standard, the Permittee shall, for each press, operate a capture system and control device and limit the organic HAP emission rate to no more than 0.04 kg organic HAP emitted per kg material applied as determined on a monthly average as-applied basis. The Permittee shall demonstrate compliance in accordance with the following provisions of 40 CFR 63.825(d):

(1) The Permittee shall demonstrate compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.9.9(a); and

(2) The Permittee shall demonstrate continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.9.14.

(c) The Permittee shall determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(b)(2) and Condition D.9.9(c) and (d).

(d) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.9.9(b). The source is in compliance for the month if:

(1) All operating parameters required to be monitored under Condition D.9.14 were maintained at the appropriate values; and

(2) The total mass of organic HAP emitted by the source was not more than four percent of the total mass of inks, coatings, varnishes, adhesives, primers, solvents, diluents, reducers, thinners, and other materials applied by the source.

D.9.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.9.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.9.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions] [326 IAC 20-1-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall have been developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

(a) The purpose of the SSM plan is to –

(1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;

(2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and

(3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.

(c) Record keeping associated with the SSM plan is identified in Condition D.9.17. Reporting associated with the SSM plan is identified in Condition D.9.22.

(d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAQ, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.

(e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAQ.

(f) IDEM, OAQ shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAQ may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAQ may require reasonable revisions to a SSM plan, if IDEM, OAQ finds that the plan:

(1) Does not address a startup, shutdown, or malfunction event that has occurred;

(2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or

(3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.

(g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

D.9.7 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.9.8 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

(a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

(b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(c) A compliance test shall be performed within ninety (90) days of:

(1) Startup of a new coating facility;

(2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or

(3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.

(d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(1) Test procedures;

(2) Operating and control system parameters;

(3) Type of VOC containing process material being used; and

(4) The process and control system parameters that will be monitored during the test.

D.9.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(a) Pursuant to 40 CFR 63.825(d)(1), the Permittee shall demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures outlined below.

(1) Determine the oxidizer destruction efficiency (E) for each of the control devices using the following procedure pursuant to 40 CFR 63.827(d):

(A) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each thermal oxidizer and the associated catalyst bed inlet temperature for each catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.

(iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.

(iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.

(v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.

(vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (a) through (c) below. The Permittee shall submit notice of the intended test method to IDEM, OAQ for approval along with notice of the performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:

(a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.3; or

(b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or

(c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \left[\sum_{i=1}^{n} C_i \, M \, W_i \right] [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(B) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(C) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For each thermal oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. For each catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.9.3.

(2) Pursuant to 40 CFR 63.827(e)(1), determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.9.3 by conducting a performance test in accordance with Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B to confirm that an enclosure meets the requirements for permanent total enclosure. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.

(3) Calculate the overall organic HAP control efficiency, (R), achieved by each control device and capture system using the following equation:

R = EF / 100

where E and F are determined according to paragraphs (a)(1) and (2) of this condition.

(4) Based on stack tests conducted in November and December of 1999 and June of 2000, the Permittee shall operate the oxidizers at all times the presses are in operation, maintain the 100 percent capture efficiencies, and demonstrate continuous compliance in accordance with the following:

(A) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.9.3, and D.9.9(d).

(B) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.9.3, and D.9.9(d).

(C) The thermal oxidizing incinerator identified as OXD#6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.9.3, and D.9.9(d).

(D) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.9.3, and D.9.9(d).

(b) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, $M_{C\,i}$.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, $M_{C\,j}$.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci}\, C_{hi} + \sum_{j=1}^{q} M_{Cj}\, C_{hj}\right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100}\right)\right] + \sum_{i=1}^{p} M_{Bi}\, C_{hi} + \sum_{j=1}^{q} M_{Bj}\, C_{hj}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(c) Pursuant to 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, thinner, reducer, diluent, and other material applied by following the procedure in 40 CFR 63.827(c)(2) included below and shall use this value for the organic HAP content for all compliance purposes.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(d) Pursuant to 40 CFR 63.825(d)(1)(xi), the Permittee is in compliance if the oxidizers are operated such that the average combustion temperature or average temperature upstream of the catalyst bed is greater than the operating parameter established in accordance with 40 CFR 63.828(a)(4) and Condition D.9.9 for each three-hour period, and the organic HAP emission rate based on material applied, S, is 0.04 kg organic HAP per kg material applied or less.

(e) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.9.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.9.10 Testing Requirements [Agreed Order A-3820]

Pursuant to Agreed Order A-3820, effective November 30, 1998, the Permittee shall conduct annual VOC testing at Presses Nos. 1, 2, 3, and 4 to demonstrate compliance with 326 IAC 8-5-5 and applicable permit conditions. This testing shall be conducted in accordance with the requirements of 326 IAC 3-6, Source Sampling Procedures. The Permittee shall conduct the first of these tests within the fourth quarter of 1999. Subsequent tests shall be conducted during the fourth quarter of each consecutive year. This requirement shall cease after the tests conducted in the fourth quarter 2000 provided that the Permittee demonstrated complete compliance with 326 IAC 8-5-5 and applicable permit conditions during both the 1999 and 2000 tests. The performance of annual VOC testing under this Order shall otherwise satisfy any similar VOC testing requirements imposed on the Permittee under its air permits for the period of the Agreed Order.

D.9.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.9.1 and D.9.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.9.12 VOC Emissions

Compliance with Condition D.9.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.9.13 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.9.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.9.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.9.4.

(d) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.9.4.

(e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.9.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.9.14 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

(a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate; and

(b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate.

D.9.15 Monitoring Requirements [40 CFR 63.828] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.9.3 to ensure proper operation and maintenance by implementing the following requirements:

(a) The Permittee shall, for each dryer associated with an intermittently-controllable work station, secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line.

(b) For the thermal oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in °C or ±1°C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(c) For each catalytic oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in °C or ±1°C, whichever is greater. The thermocouple or temperature sensor shall

be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

(d) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

(e) Any excursion from the required operating parameters which are monitored in accordance with this condition and Condition D.9.9(c)(4) and (d), unless otherwise excused, shall be considered a violation of Condition D.9.3.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.9.16 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.9.17 Record Keeping Requirements [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:

(1) The name and identification of each coating used at each coating facility.

(2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

(3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.

(4) The required overall emission reduction efficiency for each day for each coating facility.

(5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.9.8 pursuant to 326 IAC 8-1-12(b)(1)(C).

(6) Control device monitoring data as follows:

(A) For the thermal incinerator, the following:

(i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and

(ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(B) For each catalytic incinerator, the following:

(i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;

(ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and

(iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.

(7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.

(8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.9.18 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:

(1) Records of all measurements needed to demonstrate compliance with Conditions D.9.3 and D.9.6. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(A) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

(B) The occurrence and duration of each malfunction of the air pollution control equipment;

(C) All maintenance performed on the air pollution control equipment;

(D) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.9.6;

(E) All information necessary to demonstrate conformance with the SSM plan required in Condition D.9.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan (The information needed to demonstrate conformance with the SSM plan may be recorded using a “checklist”, or some other effective form or record keeping, in order to minimize the record keeping burden for conforming events);

(F) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);

(G) All required measurements needed to demonstrate compliance with Condition D.9.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);

(H) All results of performance tests and CMS performance evaluations;

(I) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;

(J) All CMS calibration checks;

(K) All adjustments and maintenance performed on CMS; and

(L) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(2) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.9.14. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:

(A) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

(B) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

(C) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);

(D) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;

(E) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;

(F) The nature and cause of any malfunction (if known);

(G) The corrective action taken or preventive measures adopted;

(H) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;

(I) The total process operating time during the reporting period; and

(J) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

In order to satisfy the requirements of paragraphs (F) through (H) of this condition and to avoid duplicative record keeping efforts, the Permittee may use the SSM plan or records kept to satisfy the record keeping requirements of the SSM plan specified in Condition D.9.6, provided that such plan and records adequately address the requirements of paragraphs (F) through (H) of this condition.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.9.19 Record Keeping Requirements

(a) To document compliance with Condition D.9.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.9.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press while operating the incinerators;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the

temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.9.20 Record Keeping Requirements [Agreed Order A-3820]

Pursuant to Agreed Order #A-3820, effective November 30, 1998, for a period of four (4) years, the Permittee shall maintain, and provide upon request, a record of all times that an incinerator is overloaded or shuts down and results in the triggering of the automatic press shut-off. This record should include the dates, times, and the presses and incinerators involved in each of these incidents.

D.9.21 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

(a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(1) Name and location of the coating facility;

(2) Identification of the control system where the noncompliance occurred and the coating facility it served;

(3) Time, date and duration of the noncompliance; and

(4) Corrective action taken.

(b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.9.22 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.9.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 8 and 10 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), and D.10.21(a). The report submitted by the Permittee does require the certification by the responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.9.15 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.9.23 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAQ require monitoring of an alternate parameter.

(b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 8 and 10 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), and D.10.22(b).

(c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).

(d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).

(1) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.9.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAQ; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).

(2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.

(e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a

semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.9.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 8 and 10 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), and D.10.22(e).

SECTION D.10 FACILITY OPERATION CONDITIONS

Alternative Operating Scenario 10 for Printing Stations Using Solvent-Based Materials

Facility Description [326 IAC 2-7-5(15)] - The following packaging rotogravure printing operations:

(a) one (1) ten (10) station packaging rotogravure printing press identified as Press #1 (ten stations: P1U1 through P1U10), constructed in May of 1990, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P1U1-P1U10 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#1 exhausting through one (1) stack (S/V ID: S-OXD1); or
(2) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#1 and OXD#2, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD1 and S-OXD2), respectively.

(b) one (1) nine (9) station packaging rotogravure printing press identified as Press #2 (nine stations: P2U1 through P2U9), constructed in April of 1991, with a maximum line speed of 840 feet per minute (ft/min) when printing with ink and 740 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system with a total heat input rate of 7.76 million (MM) British thermal units (Btu) per hour. The volatile organic compound (VOC) emissions from P2U1-P2U9 are controlled by one of the following:

(1) a single catalytic oxidizing incinerator identified as OXD#2 exhausting through one (1) stack (S/V ID: S-OXD2); or
(2) a single catalytic oxidizing incinerator identified as OXD #5 exhausting through one (1) stack (S/V ID: S-OXD5); or
(3) two (2) catalytic oxidizing incinerators configured in parallel, respectively identified as OXD#2 and OXD#5, with each incinerator exhausting through one (1) stack (S/V ID: S-OXD2 and S-OXD5), respectively.

(c) one (1) eight (8) station packaging rotogravure printing press identified as Press #3 (eight stations: P3U1 through P3U8), constructed in April of 1997, with a maximum line speed of 800 ft/min when printing with ink and 700 ft/min when printing with ink and adhesive. The volatile organic compound (VOC) emissions from P3U1-P3U8 are controlled by one catalytic oxidizing incinerator identified as OXD#5 exhausting through one (1) stack (S/V ID: S-OXD5).

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ten stations (P4U-1 through P4U-10), with a maximum line speed of 800 feet per minute (ft/min) and firing natural gas with a total heat input rate of five (5) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8, P4U-9 and P4U-10 are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-10, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-9 are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.10.1 Graphic Arts Operations [326 IAC 8-5-5] [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-5-5(c)(3)(B) (Graphic Arts Operations), the Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

(c) Pursuant to 326 IAC 8-5-5(c)(3)(B), the following shall apply:

(1) The catalytic oxidizing incinerator identified as OXD #1 shall maintain a minimum operating temperature of 650°F or a temperature determined in the most recent compliance tests (described in Condition D.10.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(2) The catalytic oxidizing incinerator identified as OXD#2 shall each maintain a minimum operating temperature of 600°F or a temperature determined in the most recent compliance tests (described in Condition D.10.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(3) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating temperature of 1,500°F or a temperature determined in the most recent compliance tests (described in Condition D.10.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(4) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F or at least a temperature determined in the most recent compliance tests (described in Condition D.10.8) to maintain a minimum 90% destruction of the nonmethane VOC captured.

(d) Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices), this facility is subject to the following requirements when utilizing a thermal and/or catalytic oxidizer to comply with 326 IAC 8-5-5(c)(3)(B):

(1) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or

subsequent compliance test or upon the written request of IDEM, OAQ.

(2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAQ inspectors.

D.10.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A] [326 IAC 2-4.1]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section, as specified in Table 1 of 40 CFR 63, Subpart KK.

D.10.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall limit emissions to no more than a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

(b) Pursuant to 40 CFR 63.825(b)(10), to demonstrate compliance with this standard, the Permittee shall, for each press, operate a capture system and control device and limit the monthly organic HAP emissions to less than the allowable emissions as calculated in accordance with 40 CFR 63.825(e) and Condition D.10.9(b). The Permittee shall demonstrate compliance in accordance with the following provisions of 40 CFR 63.825(d):

(1) The Permittee shall demonstrate compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.10.9(a); and

(2) The Permittee shall demonstrate continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.10.14.

(c) The Permittee shall determine the solids content and organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR 63.827(c)(2) and Condition D.10.9(c) and (d).

(d) The Permittee shall determine the organic HAP emissions for the affected source for the month by summing all organic HAP emissions calculated according to Condition D.10.9(c). The source is in compliance for the month if:

(1) All operating parameters required to be monitored under Condition D.10.14 were maintained at the appropriate values; and

(2) The total mass of organic HAP emitted by the source was not more than the equivalent allowable organic HAP emissions for the source, H_a, calculated in accordance with 40 CFR 63.825(e) and Condition D.10.9(b).

D.10.4 PSD Minor Limit [326 IAC 2-2]

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor

source under 326 IAC 2-2 (PSD). The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

D.10.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

D.10.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions] [326 IAC 20-1-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall have been developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

(a) The purpose of the SSM plan is to –

(1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;

(2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and

(3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.

(c) Record keeping associated with the SSM plan is identified in Condition D.10.17. Reporting associated with the SSM plan is identified in Condition D.10.22.

(d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAQ, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.

(e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAQ.

(f) IDEM, OAQ shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAQ may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAQ may require reasonable revisions to a SSM plan, if IDEM, OAQ finds that the plan:

(1) Does not address a startup, shutdown, or malfunction event that has occurred;

(2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or

(3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.

(g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

D.10.7 Enforcement Action [Agreed Order A-3820]

The Permittee shall comply with Agreed Order #A-3820, effective November 30, 1998. The Agreed Order is effective for a period of four (4) years from the Effective Date of the Agreed Order.

Compliance Determination Requirements

D.10.8 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

(a) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

(b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(c) A compliance test shall be performed within ninety (90) days of:

(1) Startup of a new coating facility;

(2) Changing the method of compliance for an existing coating facility from compliant coatings or daily-weighted averaging to control devices; or

(3) Receipt of a written request from IDEM, OAQ or the U.S. EPA.

(d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAQ at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(1) Test procedures;

(2) Operating and control system parameters;

(3) Type of VOC containing process material being used; and

(4) The process and control system parameters that will be monitored during the test.

D.10.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(a) Pursuant to 40 CFR 63.825(d)(1), the Permittee shall demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures outlined below.

(1) Determine the oxidizer destruction efficiency (E) for each of the control devices using the following procedure pursuant to 40 CFR 63.827(d):

(A) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each thermal oxidizer and the associated catalyst bed inlet temperature for each catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.

(iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.

(iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.

(v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.

(vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (a) through (c) below. The Permittee shall submit notice of the intended test method to IDEM, OAQ for approval along with notice of the performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:

(a) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.3; or

(b) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less; or

(c) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \left[\sum_{i=1}^{n} C_i \, M \, W_i \right] [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(B) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(C) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. For each thermal oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. For each catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum gas temperature upstream of the catalyst bed. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.10.3.

(2) Pursuant to 40 CFR 63.827(e)(1), determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.10.3 by conducting a performance test in accordance with Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B to confirm that an enclosure meets the requirements for permanent total enclosure. For permanent total enclosures, capture efficiency shall be assumed as 100 percent.

(3) Calculate the overall organic HAP control efficiency, (R), achieved by each control device and capture system using the following equation:

R = EF / 100

where E and F are determined according to paragraphs (a)(1) and (2) of this condition.

(4) Based on stack tests conducted in November and December of 1999 and June of 2000, the Permittee shall operate the oxidizers at all times the presses are in operation, maintain the 100 percent capture efficiencies, and demonstrate continuous compliance in accordance with the following:

(A) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.10.3, and D.10.9(e).

(B) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent stack test to maintain compliance with Conditions D.10.3, and D.10.9(e).

(C) The thermal oxidizing incinerator identified as OXD#6 shall maintain a minimum operating temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.10.3, and D.10.9(e).

(D) The catalytic oxidizing incinerator identified as OXD#5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with Conditions D.10.3, and D.10.9(e).

(b) Pursuant to 40 CFR 63.825(e), the Permittee shall calculate the monthly allowable HAP emissions, H_a, as follows:

(1) Determine the as-purchased mass of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, M_i.

(2) Determine the as-purchased solids content of each ink, coating, varnish, adhesive, primer, and other solids-containing material applied each month, in accordance with 40 CFR 63.827(c)(2), C_{si}, and part (a) above.

(3) Determine the as-purchased mass fraction of each ink, coating, varnish, adhesive, primer, and other solids-containing material which was applied at 20 weight-percent or greater solids content, on an as-applied basis, G_i.

(4) Determine the total mass of each solvent, diluent, thinner, or reducer added to materials which were applied at less than 20 weight-percent solids content, on an as-applied basis, each month, M_{Lj}.

(5) Calculate the monthly allowable HAP emissions, H_a, using the following equation:

$$H_a = 0.20 \left[\sum_{i=1}^{p} M_i G_i C_{si} \right] + 0.04 \left[\sum_{i=1}^{p} M_i (1 - G_i) \right] + \left[\sum_{j=1}^{q} M_{Lj} \right]$$

(c) Pursuant to 40 CFR 63.825(g), the Permittee shall determine the mass of organic HAP emitted using the following procedure:

(1) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in bypass mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on never-controlled work stations during the month, M_{Bi}.

(2) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in bypass mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on never-controlled work stations during the month, M_{Bj}.

(3) Determine the sum of the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on intermittently-controllable work stations in controlled mode and the mass of all inks, coatings, varnishes, adhesives, primers, and other solids-containing materials which are applied on always-controlled work stations during the month, M_{Ci}.

(4) Determine the sum of the mass of all solvents, reducers, thinners, and other diluents which are applied on intermittently-controllable work stations in controlled mode and the mass of all solvents, reducers, thinners, and other diluents which are applied on always-controlled work stations during the month, M_{Cj}.

(5) Calculate the organic HAP emitted during the month using the following equation:

$$H = \left[\sum_{i=1}^{p} M_{Ci} C_{hi} + \sum_{j=1}^{q} M_{Cj} C_{hj}\right] * \left[1 - \left(\frac{E}{100} * \frac{F}{100}\right)\right] + \left[\sum_{i=1}^{p} M_{Bi} C_{hi} + \sum_{j=1}^{q} M_{Bj} C_{hj}\right]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions).

(d) Pursuant to 40 CFR 63.827(c)(2), the Permittee shall determine the volatile matter and solids content of inks, coatings, varnishes, adhesives, primers, solvents, thinners, reducers, diluents, and other materials applied by following the procedure below.

(1) The Permittee shall determine the volatile matter and solids weight-fraction of each ink, coating, varnish, adhesive, primer, solvent, reducer, thinner, diluent, and other material applied using Method 24 of 40 CFR part 60, appendix A. The Method 24 determination may be performed by the manufacturer of the material and the results provided to the Permittee.

(2) If these values cannot be determined using Method 24, the Permittee shall submit an alternative technique for determining their values for approval by the Administrator.

(3) The Permittee may rely on formulation data, subject to the following, in accordance with the provisions of 40 CFR 63.827(c)(3):

(A) The Permittee may determine the volatile matter content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers; and

(B) In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR part 60, appendix A, the applicable test method shall

govern, unless after consultation, the Permittee can demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(e) Pursuant to 40 CFR 63.825(d)(1)(xi), the Permittee is in compliance if the oxidizers are operated such that the average combustion temperature or average temperature upstream of the catalyst bed is greater than the operating parameter established in accordance with 40 CFR 63.828(a)(4) and Condition D.10.9 for each three-hour period, and the organic HAP emitted during the month, H, is less than the calculated allowable organic HAP, H_a, as determined using 40 CFR 63.825(e) and Condition D.10.9(b).

(f) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.10.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.10.10 Testing Requirements [Agreed Order A-3820]

Pursuant to Agreed Order A-3820, effective November 30, 1998, the Permittee shall conduct annual VOC testing at Presses Nos. 1, 2, 3, and 4 to demonstrate compliance with 326 IAC 8-5-5 and applicable permit conditions. This testing shall be conducted in accordance with the requirements of 326 IAC 3-6, Source Sampling Procedures. The Permittee shall conduct the first of these tests within the fourth quarter of 1999. Subsequent tests shall be conducted during the fourth quarter of each consecutive year. This requirement shall cease after the tests conducted in the fourth quarter 2000 provided that the Permittee demonstrated complete compliance with 326 IAC 8-5-5 and applicable permit conditions during both the 1999 and 2000 tests. The performance of annual VOC testing under this Order shall otherwise satisfy any similar VOC testing requirements imposed on the Permittee under its air permits for the period of the Agreed Order.

D.10.11 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.10.1 and D.10.4 shall be determined pursuant to 326 IAC 8-1-2(a) and 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

D.10.12 VOC Emissions

Compliance with Condition D.10.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.10.13 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be in operation at all times that these units are in operation to ensure compliance with condition D.10.4.

(b) The catalytic oxidizing incinerator identified as OXD#1 shall maintain a minimum operating temperature of 650°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.10.4.

(c) The catalytic oxidizing incinerator identified as OXD#2 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack tests to maintain compliance with condition D.10.4.

(d) The thermal oxidizing incinerator identified as OXD #6 shall maintain a minimum operating

temperature of 1,500°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.10.4.

(e) The catalytic oxidizing incinerator identified as OXD #5 shall maintain a minimum operating temperature of 600°F during operation or a temperature that has been determined from the most recent compliant stack test to maintain compliance with condition D.10.4.

Note: The use of the oxidizers to control VOC emissions from Presses #1 through #4 to comply with the PSD minor VOC emission limitation was voluntarily proposed by the source. Therefore, the source may apply for a modification to remove the requirement to operate the oxidizers at all times that any of the presses are in operation under this Alternative Operating Scenario at any time if compliance with the PSD minor VOC emission limit can be achieved by other means.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.10.14 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the monitoring equipment requirements shall be as follows:

(a) When the thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate; and

(b) When a catalytic incinerator is used for VOC reduction, a temperature device capable of continuously recording the temperature in the gas stream immediately before and after the catalyst bed of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5°C), whichever is more accurate.

D.10.15 Monitoring Requirements [40 CFR 63.828] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance test of a control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.10.3 to ensure proper operation and maintenance by implementing the following requirements:

(a) The Permittee shall, for each dryer associated with an intermittently-controllable work station, secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line.

(b) For the thermal oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in °C or ±1°C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(c) For each catalytic oxidizer, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall be capable of monitoring temperature with an accuracy of ±1 percent of the temperature being monitored in °C or ±1°C, whichever is greater. The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

(d) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

(e) Any excursion from the required operating parameters which are monitored in accordance with this condition and Condition D.10.9(c)(4) and (d), unless otherwise excused, shall be considered a violation of Condition D.10.3.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.10.16 Contemporaneous Log for Alternate Operating Scenarios [326 IAC 2-7-5(9)]

(a) Pursuant to 326 IAC 2-7-5(9)(A), contemporaneously with making a change from one alternative operating scenario to another, the Permittee shall make a record in a log at the permitted facility of the scenario under which it is operating. The record should state the alternative operating scenario for each station, since different stations at the same press may be operating under different scenarios.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.10.17 Record Keeping Requirements [326 IAC 8-1-12]

(a) Pursuant to 326 IAC 8-1-12(c), upon changing the method of compliance for an existing coating facility from the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)) to control devices (326 IAC 8-5-5(c)(3)(B)), the Permittee shall collect and record each day and maintain all of the following information for each coating facility:

(1) The name and identification of each coating used at each coating facility.

(2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

(3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.

(4) The required overall emission reduction efficiency for each day for each coating facility.

(5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.10.8 pursuant to 326 IAC 8-1-12(b)(1)(C).

(6) Control device monitoring data as follows:

(A) For the thermal incinerator, the following:

(i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator; and

(ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(B) For each catalytic incinerator, the following:

(i) Continuous records of the temperature of the gas stream both upstream and downstream of the catalyst bed of the incinerator;

(ii) Records of all three (3) hour periods of operation in which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty degrees Fahrenheit (50°F) (twenty-eight degrees Centigrade (28°C)) below the average temperature of the process vent stream that existed during the most recent test that demonstrated that the coating facility was in compliance; and

(iii) Records of all three (3) hour periods of operation in which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent test that demonstrated that the coating facility was in compliance.

(7) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.

(8) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.10.18 Record Keeping Requirements [40 CFR 63.829] [326 IAC 20-18-1] [326 IAC 2-4.1]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:

(1) Records of all measurements needed to demonstrate compliance with Conditions D.10.3 and D.10.6. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(A) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

(B) The occurrence and duration of each malfunction of the air pollution control equipment;

(C) All maintenance performed on the air pollution control equipment;

(D) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.10.6;

(E) All information necessary to demonstrate conformance with the SSM plan required in Condition D.10.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan (The information needed to demonstrate conformance with the SSM plan may be recorded using a “checklist”, or some other effective form or record keeping, in order to minimize the record keeping burden for conforming events);

(F) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);

(G) All required measurements needed to demonstrate compliance with Condition D.10.3 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);

(H) All results of performance tests and CMS performance evaluations;

(I) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;

(J) All CMS calibration checks;

(K) All adjustments and maintenance performed on CMS; and

(L) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(2) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.10.14. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:

(A) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

(B) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

(C) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);

(D) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;

(E) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;

(F) The nature and cause of any malfunction (if known);

(G) The corrective action taken or preventive measures adopted;

(H) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;

(I) The total process operating time during the reporting period; and

(J) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

In order to satisfy the requirements of paragraphs (F) through (H) of this condition and to avoid duplicative record keeping efforts, the Permittee may use the SSM plan or records kept to satisfy the record keeping requirements of the SSM plan specified in Condition D.10.6, provided that such plan and records adequately address the requirements of paragraphs (F) through (H) of this condition.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.10.19 Record Keeping Requirements

(a) To document compliance with Condition D.10.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.10.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total VOC usage for each month at each press while operating the incinerators;

(4) The weight of VOCs emitted for each compliance period for each press; and

(5) The continuous temperature records for the catalytic and thermal incinerators and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.10.20 Record Keeping Requirements [Agreed Order A-3820]

Pursuant to Agreed Order #A-3820, effective November 30, 1998, for a period of four (4) years, the Permittee shall maintain, and provide upon request, a record of all times that an incinerator is overloaded or shuts down and results in the triggering of the automatic press shut-off. This record should include the dates, times, and the presses and incinerators involved in each of these incidents.

D.10.21 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-5-5(c)(3)(B) and 326 IAC 8-1-12, the Permittee shall notify IDEM, OAQ in either of the following instances:

(a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAQ within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(1) Name and location of the coating facility;

(2) Identification of the control system where the noncompliance occurred and the coating facility it served;

(3) Time, date and duration of the noncompliance; and

(4) Corrective action taken.

(b) At least thirty (30) calendar days before changing the method of compliance from control devices (326 IAC 8-5-5(c)(3)(B)) to the use of compliant coatings (326 IAC 8-5-5(c)(1), (2), or (4)), the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b). Upon changing the method of compliance from control devices to the use of compliant coatings, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b), applicable to the coating facility subject to 326 IAC 8-5-5.

D.10.22 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.10.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This quarterly summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 9 in Conditions D.1.17(a), D.2.17(a), D.3.17(a), D.4.17(a), D.5.17(a), D.6.17(a), D.7.21(a), D.8.21(a), and D.9.21(a). The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 326 IAC 2-7-5(9)(C), the Permittee shall include a summary of the records required under Condition D.10.15 in the annual compliance certification submitted under 326 IAC 2-7-6(5) and Condition B.11.

D.10.23 Reporting Requirements [40CFR 63.830] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAQ require monitoring of an alternate parameter.

(b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions). This notification can be submitted in the same notification required for Alternative Operating Scenarios 1 through 9 in Conditions D.1.18(a), D.2.18(a), D.3.18(a), D.4.18(a), D.5.18(a), D.6.18(a), D.7.22(b), D.8.22(b), and D.9.22(b).

(c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).

(d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).

(1) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.10.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAQ; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).

(2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.

(e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standards in Condition D.10.3. This summary report can be submitted in the same summary report required for Alternative Operating Scenarios 1 through 9 in Conditions D.1.18(b), D.2.18(b), D.3.18(b), D.4.18(b), D.5.18(b), D.6.18(b), D.7.22(e), D.8.22(e), and D.9.22(e).

SECTION D.11 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1);

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.11.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

The cold cleaner degreasing operation PW2 is subject to this rule. These degreasing operations shall comply with the following requirements.

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.11.2 PSD Minor Limit [326 IAC 2-2]

The source wishes to limit the source-wide potential to emit VOC, to less than 250 tons per year to become a minor source under 326 IAC 2-2 (PSD). The following limits shall enable the source to achieve this status:

(a) The total VOC consumption in parts washer PW2 shall be limited to 29.95 tons per twelve (12) consecutive month period, rolled on a monthly basis.

The above emission limits including VOC emissions from natural gas combustion, the printing operations, and the insignificant activities will limit source wide VOC emissions to less than 250 tons per year.

D.11.3 Halogenated Solvent Cleaning [40 CFR 63, Subpart T] [326 IAC 20]

The cold cleaner degreasing facilitiey PW2 shall not utilize any of the halogenated solvents (methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform), or any combination of these halogenated HAP solvents in a total concentration greater than five (5%) percent by weight.

D.11.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.11.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.11.2 and D.11.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.11.6 VOC Emissions

Compliance with Condition D.11.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.11.7 Record Keeping Requirement

(a) To document compliance with Conditions D.11.2 and D.11.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.11.2 and D.11.3

(1) The amount and VOC and HAP content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage in parts washer PW2 for each month;

(5) The weight of VOC emitted for each compliance period; and

(6) The continuous temperature records for the catalytic and thermal incinerators controlling parts washer PW1 and the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) These records shall be maintained in accordance with Section C - General Record Keeping Requirements.

D.11.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.11.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.12 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following degreasing operation

(a) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

D.12.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.12.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.12.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAQ, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.12.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

D.12.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

Operation Conditions

See Section D.11 for Operation Conditions

SECTION D.13 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following insignificant activities

(a) one (1) natural gas fired hot oil boiler identified as TH1 used to heat Press #3, rated at 6 MMBtu per hour and exhausting through one (1) stack identified as S004.

(b) One (1) Offset Gravure Coater station with an Electron Beam Curing Unit, with a maximum line speed of 1000 feet per minute and a printing width of 42 inches with maximum coverage of 4.74 pounds per million square inches.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.13.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating**,** the PM emissions from the 6.0 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.13.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Surface Coating Emission Limitations: Paper Coating Operations), the Permittee may not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a label coating line.

D.13.3 Volatile Organic Compounds (VOC) [326 IAC 7-2-10.5]

Any change or modification to the Offset Gravure Coater station that may increase the VOC emissions to 15 pounds per day or more must be approved by OAQ before the change can take place.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) _____

? Report (specify) _____

? Notification (specify) _____

? Affidavit (specify) _____

? Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007

This form consists of 2 pages **Page 1 of 2**

This is an emergency as defined in 326 IAC 2-7-1(12)

? The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
? The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:

Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007
Facility: Presses #1 - #4 emission units P1U1-10, P2U1-9, P3U1-8, and P4U1-10
Parameter: volatile organic compounds (VOC)
Limit: The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses #1 through #4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U10) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

The Parts Washer PW1 quarterly report form has been removed.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007
Facility: Parts Washer PW2
Parameter: volatile organic compounds (VOC)
Limit: The total VOC consumption in parts washer PW2 shall be limited to 29.95 tons per twelve (12) consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Consumed This Month (tons)	VOC Consumed Previous 11 Months (tons)	12 Month Total VOC Consumed (tons)

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report

The spray cold cleaner degreaser SD1 quarterly report form has been removed

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Multi-Color Corporation
Source Address: 2281 South U.S. 31, Scottsburg, IN 47170
Mailing Address: 2281 South U.S. 31, Scottsburg, IN 47170
Part 70 Permit No.: T143-9310-00007

Months: _____ **to** _____ **Year:** _____
Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviation that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	

Response Steps Taken:

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a
Significant Source Modification and a Significant Permit Modification
to a Part 70 Operating Permit

Source Background and Description

Source Name:	Multi-Color Corporation
Source Location:	2281 South U.S. 31, Scottsburg, Indiana 47170
County:	Scott
SIC Code:	2754
Part 70 Permit No.:	143-9310-00007
Date Issued:	April 16, 2001
Significant Source Modification No.:	143-18145-00007
Significant Permit Modification No.:	143-18221-00007
Permit Reviewer:	RT/ EVP

The Office of Air Quality (OAQ) has reviewed a Significant Source Modification and Significant Permit Modification permit application from Multi-Color Corporation, relating to the operation of their existing stationary packaging rotogravure printing operation.

History

Multi-color was issued Part 70 operating permit T143-9310-00007, on April 16, 2001. The source was issued a Significant Permit Modification No. 143-16498-00007, on March 25, 2003 to replace the eight (8) station packaging rotogravure printing press identified as Press # 4, with a nine (9) station packaging rotogravure printing press, also identified as press # 4. However, the source did not commence construction of the nine (9) station press. On September 18, 2003, Multi-Color Corporation submitted an application to OAQ requesting a significant source and permit modification to replace the nine (9) station packaging rotogravure printing press with a ten (10) station packaging rotogravure printing press.

Explanation of Modification Requested

On September 18, 2003, the Multi-Color Corporation submitted a request to :

(a) replace the previously permitted (not yet constructed) nine (9) station packaging rotogravure printing press identified as Press # 4, with a ten (10) station packaging rotogravure printing press. Both the previously permitted and proposed printing presses have a maximum design line speed of 800 feet per minute;

(b) replace the control devices of Press # 4 (OXD # 3 and OXD # 4, with a maximum combined design capacity of 9.0 MMBtu/ hr), with a single natural gas fired regenerative thermal oxidizer (OXD # 6 with a maximum design capacity of 204.0 MMBtu/ hr). OXD # 6 will also replace the existing control device of press # 1 (OXD # 1, with a maximum design capacity

of 11.0 MMBtu/ hr). The emissions from the thermal oxidizer will be exhausted through stack S-OXD6 instead of existing S-OXD3 and S-OXD4, along with S-OXD1; and

(c) remove solvent cold cleaner degreaser SD1.

During the Part 70 permit review, the reviewer limited the source VOC emissions to 249 tons per year to render the requirements of PSD not applicable. Specifically, the input VOCs to the presses (Presses # 1-# 4) were limited to 3,458 tons per year before controls (207.5 tons per year after controls). The other miscellaneous unlimited VOC emissions were limited to 13.05 tons per year. Removing the solvent cold cleaner, during this modification, will decrease the emissions by 10 tons per year. Since the source is allowed 249 tons per year, the degreasing unit input VOCs shall be adjusted to 28.45 tons per year for part washer PW2.

207.5 tons/yr + 13.05 tons/ yr + 28.45 tons /yr = 249 tons / yr

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities in this modification review process.

Existing Approvals

The source was issued a Part 70 Operating Permit T143-9310-00007 on April 16, 2001. The source has since received the following:

(a) First Administrative Amendment No.: 143-15020-00007, issued on December 5, 2001;

(b) First Significant Source Modification No.: SSM 143-16559-00007, issued on March 11, 2003; and

(c) First Significant Permit Modification No.: SPM 143-16498-00007, issued on March 25, 2003.

Enforcement Issue

There are no enforcement actions associated with the equipment proposed in this modification.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (scfm)	Temperature (^{0}F)
S-OXD6	Ten (10) station packaging rotogravure press	40	3.5	60,000	210

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 17 , 2003. Additional information was received on October 14, 2003.

Emission Calculations

The emissions generated by the equipment of the proposed modification are VOC and HAP emissions from replacement Press # 4.

(a) Potential to Emit (PTE):

The following calculations determine the PTE due to the proposed modification.

(1) VOC:

The following calculations determine the VOC emissions based on the maximum line speeds, the maximum print width, the maximum coverage, the respective weight percent VOCs, the maximum flash-off, 8760 hours per year, and emissions before controls.

$MMin^2/yr$ * $lb/MMin^2$ * fraction VOCs * fraction flash-off * 1/2000 ton/lb

Coating	ft/min	Width (in)	$MMin^2/yr$	Fraction VOC	$lb/MMin^2$	Fraction Flash-off	tons VOC/yr
Adhesive	800	40	201830.4	0.79	24.36	1.00	1942.11
Ink/ Varnish	800	40	201830.4	0.76	55.36	1.00	4246.14
						Total	**6188.25**

The worst case VOC PTE is the VOC PTE due to ink/varnish added to the top side of the substrate and the adhesive being applied to the back of the substrate. The worst case VOC PTE due to this modification is 6188.25 tons per year.

(2) HAPs:

The following calculations determine the groove forming system HAP emissions based on a maximum hourly HAP emission rate determined using independent test data based on the maximum production rate, emissions before controls, and 8760 hours of operation.
lb HAP/hr * 8760 hr/yr * 1/2000 tons/lb = tons HAP/yr

HAP	lb/hr	tons/yr
Hexane	67.35	295.00
Toluene	376.05	1647.11
	Total	**1942.11**

(b) Emissions After Controls:

The VOC and HAP emissions will be controlled by a regenerative thermal oxidizer. The required

overall control efficiencies are 94% for VOCs and 95% for HAPs. The following calculations determine the emissions after controls based on the estimated emissions before controls and the respective overall control efficiencies.

VOC Emissions After Controls (tons/yr) = Emissions Before Controls (tons/yr) * (1 - 0.94)
HAP Emissions After Controls (tons/yr) = Emissions Before Controls (tons/yr) * (1 - 0.95)

(1) VOCs:

Coating	Emissions After Controls (tons/yr)
Adhesive	116.53
Ink/ Varnish	254.77
Total	**371.30**

(2) HAPs:

HAP	Emissions Before Controls (tons/yr)	Emissions After Controls (tons/yr)
Hexane	295.0	14.75
Toluene	1647.11	**82.35**
	Total	**97.10**

Potential To Emit Before Controls for the Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO_2	-
VOC	6188.25
CO	-
NO_x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	1647.11
Combined HAPs	1942.11

Since the VOC PTE exceeds the applicable level of 25 tons per year, and the single and combined HAP PTE exceeds the respective applicable levels of 10 and 25 tons per year, the proposed

modification shall be approved via a significant source modification pursuant to 326 IAC 2-7-10.5(f)(4) and (6).

Justification for Modification

The Part 70 operating permit is being modified through both a Part 70 Significant Source Modification and Significant Permit Modification. These modifications are being performed based on the following justification:

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC) are equal to or greater than 25 tons per year. The source is subject to the provisions of 326 IAC 2-7. Therefore, the source is subject to the provisions of 326 IAC 2-7-10.5(f)(4) for this significant source modification.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single hazardous air pollutant (HAP), as defined under Section 112(b) of the Clean Air Act (CAA), is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. The source is subject to the provisions of 326 IAC 2-7. Therefore, the source is subject to the provisions of 326 IAC 2-7-10.5(f)(6) for this significant source modification.

(c) The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (No. 143-18221-00007) in accordance with 326 IAC 2-7-12(d). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Scott County.

Pollutant	Status
PM_{10}	attainment or unclassifiable
SO_2	attainment or unclassifiable
NO_2	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.

(b) Scott County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Preven-

tion of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects calendar year 2001 emissions, based upon the Indiana Air Emission Summary Data for criteria pollutants.

Pollutant	Emissions (ton/yr)
PM	0.18
PM10	0.18
SO_2	0.04
VOC	81.99
CO	1.23
NO_x	6.15

Existing Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	<100	<100	<100	<100	>100, <250	<100	>10	>25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

(a) This existing source is not a major PSD stationary source because the source criteria pollutant emissions are, after all applicable limits and standards, are less than or limited to less than the respective major source levels of 250 tons per year, and it is not one of the 28 listed source categories.

(b) These emissions are based upon application and technical support document for Significant Source Modification No.143-16599-00007, issued on March 11, 2003.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Ten (10) station rotogravure Press	0.00	0.00	0.00	< 250	0.00	0.00	82.35 (Single) 97.10 (Total)
Total Emissions	0.00	0.00	0.00	< 250	0.00	0.00	97.10

This modification to an existing minor stationary source is not a major PSD modification because the modification will be included in the source VOC emission limit of 249 tons per year.

Emissions After the Modification

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	<100	<100	<100	<100	>100, <250	<100	>10	>25

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

This source after the proposed modification is still not a major PSD stationary source because the source emissions are limited to less than the applicable major source level of 250 tons per year.

Federal Rule Applicability

(a) 40 CFR 60, Subpart QQ, Standards of Performance for the Graphic Arts Industry, Publication Rotogravure Printing, still does not apply to proposed Press # 4 because Press # 4 is a packaging rotogravure printing press, not a publication rotogravure printing press.

(b) 40 CFR 63, Subpart KK, National Emissions Standards for Printing and Publishing Industry, still applies to Press # 4 because the single and combined HAP potential emissions are greater than their respective applicable levels of 10 and 25 tons/yr. There are no additional requirements which become applicable for the proposed press.

(c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:

(1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

(2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and

(3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This source was issued initial Part 70 permit no. T143-9310-00007, issued on April 16, 2001. The proposed PSEU has uncontrolled PTE at greater than 100 percent of the applicable major Part 70 threshold, uses a control device (Regenerative Thermal Oxidizer) as defined in 40 CFR 64.1 to comply with the VOC emission limitation of 249 tons per year. The PSEU meets the criteria for Compliance Assurance Monitoring applicability. However, pursuant to 40 CFR 64.2 (b) (i), since the source is subject to 40 CFR 63, Subpart KK, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to the proposed modification.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is still required to have a Preventive Maintenance Plan (PMP) for all emission units and control devices of the source.

326 IAC 2-2 (Prevention of Significant Deterioration):

The source VOC emissions shall still be limited to 249 tons per year to render the PSD requirements under 326 IAC 2-2 not applicable.

326 IAC 2-6 (Emission Reporting):

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new source, process, or emission

unit which is constructed after July 27, 1997 and has single and combined HAP potential to emit (PTE) greater than 10 and 25 tons per year, respectively, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).
The proposed replacement press (Press # 4) is not subject to this rule because it is subject to 40 CFR 63, Subpart KK NESHAP requirements.

326 IAC 8-1-6 (General Reduction Requirements)

326 IAC 8-1-6 (General Reduction Requirements) applies to facilities not regulated by other rules in Article 8 with potential VOC emissions equal to or greater than 25 tons per year.

The proposed packaging rotogravure printing press is subject to 326 IAC 8-5-5 (Graphic Arts Operations). Therefore, the press is not subject to the requirements of 326 IAC 8-1-6.

326 IAC 8-1-10 (VOC Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Compliant Coatings)

326 IAC 8-1-10 applies to any source that uses compliant coatings to comply with a VOC emission limit and which also meets the applicability of criteria of 326 IAC 8-5-5(a)(1), (a)(2), or (a)(3).

The proposed press (Press # 4) will meet the applicability criteria of 326 IAC 8-5-5(a)(2), when using compliant coating.

326 IAC 8-1-12 (VOC Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices)

326 IAC 8-1-12 applies to any source that uses a control device to comply with a VOC emission limit, and which also meets the applicability of criteria of 326 IAC 8-5-5(a)(1), (a)(2), or (a)(3) for Graphics Arts Operations.

The proposed press (Press # 4) meets the applicability criteria of 326 IAC 8-5-5(a)(2). The owner or operator is also proposing to use control devices to meet the requirements of 326 IAC 8-5-5 when applying solvent based materials. Therefore, the requirements of 326 IAC 8-1-12 still apply to this source when operating the VOC control devices.

326 IAC 8-5-5 (Graphic Arts Operations)

The proposed packaging rotogravure printing press (Press # 4) is subject to 326 IAC 8-5-5 because the press is being constructed after 1980 and has potential VOC emissions greater than 25 tons per year.

Pursuant to this rule, no owner or operator of a facility subject to this section and employing solvent-containing ink may cause, allow, or permit the operation of the facility unless:

(a) the volatile fraction of the ink, as it is applied to the substrate, contains twenty-five (25) percent by volume or less of VOC, and seventy-five (75) percent by volume or more of water; or
(b) the ink as it is applied to the substrate, less water, contains sixty (60) percent by volume or more of nonvolatile material; or
(c) the owner or operator installs and operates a control device (i.e. incineration system) that oxidizes at least 90% of the nonmethane VOC to carbon dioxide and water and utilizes a capture system that, when used in conjunction with the control device, shall attain an efficiency sufficient to achieve an overall VOC control efficiency of sixty-five (65%) percent; and

(d) the ink, as applied to the substrate, meets an emission limit of 0.5 pounds of VOC per pound of solids in the ink.

The source shall comply with the VOC content limitations specified above by either using water based materials (Scenarios # 1-6) or utilizing a VOC capture and control system with an overall VOC control efficiency of 95% at Presses # 1 - # 4 when utilizing solvent based materials (Scenarios # 7-10). Therefore, the source is in determined to be in compliance with this rule.

Changes to the Permit

The following lists the changes to the existing permit that are necessary to incorporate the proposed modification. All language removed from the permit is struck-out and all added information is indicated in bold type.

1. Unit Description of Condition A.2:

The unit description of Condition A.2 shall be modified as follows to include the replacement press # 4 description, remove the previously permitted press # 4 (not yet constructed) control device descriptions, include the proposed control device (OXD6), update the stack configurations, and remove cold cleaner SD1

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
This stationary source consists of the following emission units and pollution control devices:

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~-7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6**; and**

(e) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1)**.**~~; and~~

(f) ~~one (1) immersion and mechanical spray cold cleaner degreaser, identified as SD1, constructed in September of 1993, with a solvent consumption rate of fourteen (14) gallons per day, equipped with cover for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1);~~

2. Unit Description of Section D.1:

The unit description of Section D.1 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 descriptions.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~-7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

3. Condition D.1.3:

Condition D.1.3 shall be modified as follows to include the new Press # 4 description.

D.1.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]
This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

4. Condition D.1.4:

Condition D.1.4 shall be modified as follows to include the new Press # 4 description.

D.1.4 PSD Minor Limit [326 IAC 2-2]~~[40 CFR 52.21]~~
The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of ~~9~~4%. This usage limitation will then be equivalent to a VOC emission limitation of

207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

5. Condition D.1.7:

Condition D.1.7 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.1.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]
Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.1.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

6. Condition D.1.10:

Condition D.1.10 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.1.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.1.4.

7. Unit Description of Section D.2:

The unit description of Section D.2 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 descriptions.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC

and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

8. Condition D.2.3:

Condition D.2.3 shall be modified as follows to include the new Press # 4 description.

D.2.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]
This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

9. Condition D.2.4:

Condition D.2.4 shall be modified as follows to include the new Press # 4 description.

D.2.4 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]
The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

10. Condition D.2.7:

Condition D.2.7 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.2.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]
Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.2.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

11. Condition D.2.10:

Condition D.2.10 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.2.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.2.4.

12. Unit Description of Section D.3:

The unit description of Section D.3 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 descriptions.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~-7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

13. Condition D.3.3:

Condition D.3.3 shall be modified as follows to include the new Press # 4 description.

D.3.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions

of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

14. Condition D.3.4:

Condition D.3.4 shall be modified as follows to include the new Press # 4 description.

D.3.4 PSD Minor Limit [326 IAC 2-2]~~[40 CFR 52.21]~~
The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

15. Condition D.3.7:

Condition D.3.7 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.3.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]
Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.3.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

16. Condition D.3.10:

Condition D.3.10 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.3.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and

P4U1 through P4U~~9~~**10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.3.4.

17. Unit Description of Section D.4:

The unit description of Section D.4 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 descriptions.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

18. Condition D.4.3:

Condition D.4.3 shall be modified as follows to include the new Press # 4 description.

D.4.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]
This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

19. Condition D.4.4:

Condition D.4.4 shall be modified as follows to include the new Press # 4 description.

D.4.4 PSD Minor Limit [326 IAC 2-2] ~~[40 CFR 52.21]~~
The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through

P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

20 Condition D.4.7:

Condition D.4.7 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.4.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]
Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.4.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

21. Condition D.4.10:

Condition D.4.10 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.4.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.4.4.

22. Unit Description of Section D.5:

The unit description of Section D.5 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 descriptions.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

23. Condition D.5.3:

Condition D.5.3 shall be modified as follows to include the new Press # 4 description.

D.5.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]
This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

24. Condition D.5.4:

Condition D.5.4 shall be modified as follows to include the new Press # 4 description.

D.5.4 PSD Minor Limit [326 IAC 2-2]~~[40 CFR 52.21]~~
The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

25. Condition D.5.7:

Condition D.5.7 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.5.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]
Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(c) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.5.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

26. Condition D.5.10:

Condition D.5.10 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.5.10 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.5.4.

27. Unit Description of Section D.6:

The unit description of Section D.6 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 descriptions.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U-~~7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

28. Condition D.6.3:

Condition D.6.3 shall be modified as follows to include the new Press # 4 description.

D.6.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions

of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

29. Condition D.6.4:

Condition D.6.4 shall be modified as follows to include the new Press # 4 description.

D.6.4 PSD Minor Limit [326 IAC 2-2]~~[40 CFR 52.21]~~
The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

30. Condition D.6.7:

Condition D.6.7 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.6.7 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]
Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(d) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.6.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

31. Condition D.6.10:

Condition D.6.10 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.6.10 Volatile Organic Compounds (VOC) Control
(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through #

4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.6.4.

32. Unit Description of Section D.7:

The unit description of Section D.7 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 descriptions.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~-7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

33. Condition D.7.3:

Condition D.7.3 shall be modified as follows to include the new Press # 4 description.

D.7.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]
This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

34. Condition D.7.4:

Condition D.7.4 shall be modified as follows to include the new Press # 4 description.

D.7.4 PSD Minor Limit [326 IAC 2-2] ~~[40 CFR 52.21]~~

The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

35. Condition D.7.9:

Condition D.7.9 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.7.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(e) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.7.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

36. Condition D.7.13:

Condition D.7.13 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.7.13 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.7.4.

37. Unit Description of Section D.8:

The unit description of Section D.8 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 descriptions.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~-7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

38. Condition D.8.3:

Condition D.8.3 shall be modified as follows to include the new Press # 4 description.

D.8.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]
This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

39. Condition D.8.4:

Condition D.8.4 shall be modified as follows to include the new Press # 4 description.

D.2.4 PSD Minor Limit [326 IAC 2-2] ~~[40 CFR 52.21]~~
The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of

207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

40. Condition D.8.9:

Condition D.8.9 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.8.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]
Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(e) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.8.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

41. Condition D.8.13:

Condition D.8.13 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.8.13 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~ **10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.8.4.

42. Unit Description of Section D.9:

The unit description of Section D.9 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 descriptions.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC

and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

43. Condition D.9.3:

Condition D.9.3 shall be modified as follows to include the new Press # 4 description.

D.9.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]
This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

44. Condition D.9.4:

Condition D.9.4 shall be modified as follows to include the new Press # 4 description.

D.9.4 PSD Minor Limit [326 IAC 2-2]~~[40 CFR 52.21]~~
The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

45. Condition D.9.9:

Condition D.9.9 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.9.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]
Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(e) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.9.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

46. Condition D.9.13:

Condition D.9.13 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.9.13 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~ **10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.9.4.

47. Unit Description of Section D.10:

The unit description of Section D.10 shall be modified as follows to include the new Press # 4 and thermal oxidizer OXD-6 description.

(d) one (1) packaging rotogravure printing press, identified as Press # 4, including ~~seven~~ **ten** stations (P4U1 through P4U~~7~~ **10**), with a maximum line speed of 800 feet per minute (ft/min) **and firing natural gas** ~~when printing with ink and 700 ft/min when printing with ink and adhesive, and one (1) natural gas fired press dryer system consisting of two (2) natural gas fired dryer stations, identified as P4U-8 and P4U-9~~ with a total heat input rate of ~~twelve~~ **five** (~~12~~ **5**) million (MM) British thermal units (Btu) per hour.

The volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions from P4U-8 ~~and~~**,** P4U-9 **and P4U-10** are, during periods when compliant inks, varnishes, and adhesives are applied, vented directly through stacks S-P4-~~8~~ **10** ~~and S-P4-9~~, with the VOC and HAP emissions from units P4U-1 through P4U-7 being controlled by one (1) regenerative thermal oxidizer, identified as OXD-6, then exhausted through Stack S-OXD6.

The VOC and HAP emissions from P4U-1 through P4U-~~9~~ **10** are, during periods when non-compliant inks, varnishes, and adhesives are applied, controlled by regenerative thermal oxidizer OXD6, then exhausted through Stack S-OXD-6.

48. Condition D.10.3:

Condition D.10.3 shall be modified as follows to include the new Press # 4 description.

D.10.3 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR Part 63, Subpart KK] [326 IAC 2-4.1]
This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of this rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall limit emissions to no more than four (4) percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

49. Condition D.10.4:

Condition D.10.4 shall be modified as follows to include the new Press # 4 description.

D.10.4 PSD Minor Limit [326 IAC 2-2]~~[40 CFR 52.21]~~
The source-wide potential to emit VOC is limited to less than 250 tons per year to be a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21~~. The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%. This usage limitation will then be equivalent to a VOC emission limitation of 207.5 tons per year.

The above emission limits including VOC limits from Alternative Operating Scenarios 2 through 10 and VOC emissions from natural gas combustion, solvent degreasing and the insignificant activities will limit source-wide VOC emissions to less than 250 tons per year.

50. Condition D.10.9:

Condition D.10.9 shall be modified as follows to include the testing requirement for new thermal oxidizer OXD-6.

D.10.9 Testing Requirements [40 CFR Part 63, Subpart KK] [326 IAC 20-18-1] [326 IAC 2-4.1]
Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall comply with the following requirements:

(f) Within one hundred and eighty (180) days after initial startup of thermal oxidizer # 6, the Permittee shall conduct a performance test to verify VOC overall control efficiencies (both capture efficiency and destruction efficiency) as per condition D.10.4 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance

with Section C - Performance Testing.

51. Condition D.10.13:

Condition D.10.13 shall be modified as follows to include the new Press # 4 description and new control configuration.

D.10.13 Volatile Organic Compounds (VOC) Control

(a) The catalytic and thermal oxidizers controlling VOC emissions from Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~ **10**) shall be in operation at all times that these units are in operation to ensure compliance with condition D.10.4.

52. Unit Description of Section D.11:

The unit description of Section D.11 shall be modified as follows to reflect the removal of cleaner SD1.

Facility Description [326 IAC 2-7-5(15)]

(1) one (1) mechanical spray cold cleaner degreaser, identified as PW2, with a projected solvent consumption rate of eight (8) gallons per day, utilizing closed-loop solvent recycling and distillation for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1); ~~and~~

~~(2) one (1) immersion and mechanical spray cold cleaner degreaser, identified as SD1, constructed in September of 1993, with a solvent consumption rate of fourteen (14) gallons per day, equipped with cover for VOC emissions control, and exhausting through one (1) stack (S/V ID: S-MR1).~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

53. Condition D.11.1:

Condition D.11.1shall be modified as follows to reflect the removal of cleaner SD1.

D.11.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

The cold cleaner degreasing operation~~s~~ PW2 ~~and SD1 are~~ is subject to this rule. These degreasing operations shall comply with the following requirements.

54. Condition D.11.2:

Condition D.11.2 shall be modified as follows to reflect the removal of requirements for cleaner SD1.

D.11.2 PSD Minor Limit [326 IAC 2-2] ~~[40 CFR 52.21]~~

The source wishes to limit the source-wide potential to emit VOC, to less than 250 tons per year to become a minor source under 326 IAC 2-2 (PSD) ~~and 40 CFR 52.21.~~ The following limits shall

enable the source to achieve this status:

(a) The total VOC consumption in parts washer PW2 shall be limited to ~~29.95~~ **28.45** tons per twelve (12) consecutive month period, rolled on a monthly basis.

~~(b) The total VOC consumption in degreaser SD1 shall be limited to ten (10) tons per twelve (12) consecutive month period, rolled on a monthly basis.~~

The above emission limits including VOC emissions from natural gas combustion, the printing operations, and the insignificant activities will limit source wide VOC emissions to less than 250 tons per year.

55. Condition D.11.3:

Condition D.11.3 shall be modified as follows to reflect the removal of SD1 reference.

D.11.3 Halogenated Solvent Cleaning [40 CFR 63, Subpart T] [326 IAC 20]
The cold cleaner degreasing facilities ~~y~~ **y** PW2 ~~and SD1~~ shall not utilize any of the halogenated solvents (methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform), or any combination of these halogenated HAP solvents in a total concentration greater than five (5%) percent by weight.

56. Condition D.11.7:

Condition D.11.7 shall be modified as follows to remove the PW1 and SD1 reference.

D.11.7 Record Keeping Requirements

(a) To document compliance with Conditions D.11.2 and D.11.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.11.2 and D.11.3

(1) The amount and VOC and HAP content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage in ~~each of parts washer PW1,~~ parts washer PW2~~, and degreaser SD1~~ for each month;

(5) The weight of VOC emitted for each compliance period; and

(6) The continuous temperature records for the catalytic and thermal incinerators controlling parts washer PW1 and the temperature used to demonstrate compliance during the most recent compliance stack test.

57. Quarterly Report for Presses 1 - 4:

The quarterly report for Presses 1 - 4 shall be modified as follows to reflect the new Press 4 configuration.

Facility: Presses # 1 - # 4 emission units P1U1-10, P2U1-9, P3U1-8, and P4U1-~~9~~**10**
Parameter: volatile organic compounds (VOC)
Limit: The total input VOC, including coatings, dilution solvents, and cleaning solvents, to Presses # 1 through # 4 (emission units P1U1 through P1U10, P2U1 through P2U9, P3U1 through P3U8, and P4U1 through P4U~~9~~**10**) shall be limited to 3,458 tons per twelve (12) consecutive month period. VOC emissions from each press shall be controlled by a capture and incineration system that achieves a minimum overall VOC control efficiency of 94%.

58. Testing Requirement for new thermal Oxidizer

The testing requirement for the proposed thermal oxidizer # 6 shall be added to the permit.

59. Quarterly Report for Cleaner SD1:

The quarterly report for cleaner degreaser SD1 shall be removed because SD1 has been removed.

60. Table of Contents:

The Table of Contents shall be modified to reflect the conditions that have been removed.

61. Page Numbering:

Due to formatting changes in the D Sections, the number of pages has been reduced from 168-163.

62. Reason for the removal of 40 CFR 52.21 from PSD Minor Limit Conditions:

On March 3, 2003, U.S.EPA published a notice for "Conditional Approval of Implementation Plan: Indiana" in the Federal Register / Vol. 68, No.41 at pages 9892 through 9895. This notice grants conditional approval to the PSD State Implementation Plan (SIP) under provisions of 40 CFR §§51.166 and 40 CFR §§52.770 while superceding the delegated PSD SIP authority under 40 CFR §§52.793. The effective date for these provisions is April 2, 2003. Therefore, the PSD permits will be issued under the authority of 326 IAC 2-2 and will no longer be issued under the provision of 40 CFR 52.21 and 40 CFR 124.

Conclusion

The operation of this existing stationary packaging rotogravure printing operation shall be subject to the conditions of the attached proposed Significant Source Modification 143-18145-00007 and Significant Permit Modification 143-18221-00007.